Application No.: 09/438,590 Docket No.: J2167.0125/P125

REMARKS/ARGUMENT

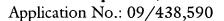
Claims 1-13 have been examined and are pending in the present application. Claims 1-13 have been rejected under 35 USC \$102(b) over Kramer et al. (US Patent 6,324,525). In light of the below remarks, reconsideration of the present application is respectfully requested.

In paragraph 5 of the Office Action, all of the claims of the present application have been rejected under \$102(b) over Kramer. Applicants respectfully transverse this rejection.

Each of independent claims 1 and 6 require receiving a bulk file containing a plurality of funds transfer transactions. Each of the claims further require grouping of these transactions into those not requiring foreign exchange operations and those "funds transfer transactions requiring a foreign exchange operation." In rejecting this explicit limitation of independent claims 1 and 6 the Office Action points to figures 20A, 20H, figures 21A - 21B and figures 25 and 26, as well as the Abstract of Kramer which refers to "aggregated electronic transactions." None of these figures nor the Abstract make any reference whatsoever to funds transfer transactions requiring foreign exchange operations, let alone grouping all of the funds transfer transactions requiring foreign exchange operations.

In rejecting the trading processor limitation of independent claim 1 (which performs the actual foreign exchange operation) the Office Action further points to column 16, line 25-column 25, line 60 as disclosing such a processor. Applicants have reviewed this extensive portion of Kramer and has found that it is completely silent with respect to conducting foreign exchange operations on funds transfer transactions.

As Kramer contains no disclosure whatsoever with respect to grouping funds transfer transactions requiring foreign exchange operations from a bulk file containing a plurality of funds transfer transactions as explicitly required by independent claims 1 and 6,



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Applicants respectfully submit that Kramer neither anticipates nor renders obvious the present invention as recited in all of the claims of the present application.

As each of the claims in the present application is currently in condition for allowance, such action is earnestly solicited.

Dated: January 29, 2003

Respectfully submitted

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I hereby certify that this correspondence is being deposited with the U.S. Postal Service as Express Mail Airbill No. EV 059554720 US, in an envelope addressed to: Box RCE, Commissioner for Patents, Washington, DG 20231, white cate shown below.

Dated: January 29, 2003

Signature:

(Michael J. Scheer)